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Federal Aviation Administration  
Office of the Chief Counsel  
Attn: Rules Docket (AGC-200)  
Docket No. 28293 Room 915G  
800 Independence Ave. SW  
Washington, DC 20591

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FAA 2000-7952-21

Comments for NPRM for Service Difficulty Reports, FAR 121.704.

A 121 operator is interpreting this proposed language to mean that "corrosion, cracks, or disbonding, that is found to be beyond the manufacturers' damage limitations, of primary or secondary aircraft structure, that is repaired in accordance with the manufacturers' manual, is **not** SDR reportable.

Example

A structural member is corroded or cracked out of limits. The manufacturers' structural repair gives instructions to replace the structural member. The 121 operator is stating that because the manufacturer gives instructions to replace the structural member in accordance with it's structural repair manual, this repair or "replacement" is **not** SDR reportable.

I am requesting that these comments be specifically addressed to ensure clarity of this proposed rulemaking.